

Tidan Inc. Privacy Protection Policy

Thank you for visiting www.travelodgemontrealcentre.com, (the "Website"), which is owned and operated by Tidan Inc. (the "Tidan", "us" or "we"). At Tidan we are concerned about privacy issues and are committed to earning the trust of our guests and Website users by adhering to high standards respecting the protection of personal information.

By using the Website or by submitting your personal information to Tidan, you signify your consent to the collection, use and disclosure of your personal information in accordance with the terms of this Policy. If you do not consent to the collection, use and disclosure of your personal information in accordance with this Policy, you should not access or use the Website nor provide any personal information to Tidan. Certain services can only be offered to you if you provide personal information to Tidan, and therefore we may not be able to offer you those services if you choose not to provide us with the required personal information.

Application and Scope

This Privacy Protection Policy applies to your use of our Website and of our services.

This Policy outlines how we handle the personal information (defined below) about you that we collect, use, disclose and receive when you visit the Website or otherwise provide us with information. Protecting the privacy and personal information of our visitors is of utmost importance to us and it dictates the way we organise and implement our activities both on and off line.

If you are located in the European Economic Area or Switzerland, the <u>Additional Terms for Users</u> <u>Located in the European Economic Area and Switzerland</u> also apply to you.

Personal Information

Personal information means any information about an identifiable individual.

In this Policy, personal information includes any information about an identifiable individual or any information that allows an individual to be identified. This may include, for example, your name, date of birth, address, e-mail address or telephone number, credit card details or other payment information, information relating to your inquiry with us, any complaints documented in a file or other personal or demographic information. In general, you may browse the Website without disclosing any personal information. If you visit the Website to read or download information, we may collect and store certain technical information that is automatically recognised, namely the date and time you access the Website, the pages viewed, the originating IP address, the domain name, the type of browser and operating system used, the URL of the referring page, the object

requested and the completion status of the request. Such information may be considered personal information, but only when this information can identify you as an individual.

Personal information does not include information that is de-identified and/or aggregated and cannot be associated with an identifiable individual.

Collection and Use of Personal Information

We collect personal information about you directly from you and from third parties whom you authorized to share such information with us. We may use such information to service our customers and for our internal purposes.

Tidan collects most of our information about you directly from you, with your consent. We usually collect your name, address, phone number(s) and email address, as well as other account and payment information, including information pertaining to your stay in one our hotels when you reserve a hotel with us, when you contact us with questions, when you subscribe to our newsletter or other commercial email communications, or when you interact with us through social media channels. We may also obtain personal information about you from third parties, with your consent, for example, through third party booking and reservation services. We generally use and disclose personal information for the purposes identified at the time of collection of the information, or as otherwise permitted or required by applicable law, including for the following purposes:

- 1. to establish, develop and preserve business relationships with our customers and other individuals with whom we deal;
- 2. to make a reservation or use Tidan services and to ensure that all related transactions are supported and implemented;
- 3. to authenticate the identity and preserve the privacy of customers contacting Tidan by telephone, electronic means or otherwise;
- 4. to communicate with you and others regarding service delivery and satisfaction, including the use of comment cards and surveys;
- 5. conduct marketing initiatives and to provide personalized services and recommendations to our customers:
- 6. for internal training and quality assurance purposes and to ensure our records are accurate and to protect customers from error and fraud;
- 7. for administrative purposes such as responding to your inquiries, invoicing, collecting and processing payment and fulfilling contractual obligations;
- 8. subject to your right to withdraw consent, to communicate with you in respect of, or distribute information about, our hotels, services, programs, events and promotions and other communications which Tidan believes may be of interest to you and other individuals:
- 9. to improve our services and help us better serve you and plan in respect of hotel accommodations, weddings, business meetings and other social events; and
- 10. to ensure proper operation of the Website and enable you to sign up.

We also collect the personal information that you volunteer when you register to receive our exclusive offers or via orders, surveys, e-mail or other forms. Should you choose to submit the personal information of another person when sharing some content of our Website with such person (for instance by using the "Invite your friend" feature), you understand that this feature is intended to be a simple way to share information respecting Tidan with a friend and you represent and warrant that, prior to submitting such information, you have obtained the recipient's consent to provide their email address to Tidan for this purpose and to allow Tidan to use their e-mail address for this purpose. Your friend will receive an email with your name and email address as well as any personal message you choose to send. The personal information of another person that you supply is collected and used by Tidan for the sole purpose of facilitating, through the "Invite a Friend", page a promotional or marketing email communication with that person and will not be further used, retained or disclosed by Tidan. The "Invite a Friend" feature is not intended to encourage spam and action may be taken against individuals who maliciously enter the personal details of another individual.

If you have applied for employment with Tidan, the personal information submitted with your job application through www.tidan.com will be used for recruitment and other customary human resources purposes. For example, we may send you information about new job opportunities within Tidan as well as other career development resources.

Your Consent

When you visit our Website or submit personal information to us, you agree to be bound by this Policy.

Tidan obtains consent from the individuals concerned for the collection, use or disclosure of personal information orally or through written documents. The form of consent sought by us will vary according to the sensitivity of the personal information, the reasonable expectations of the individuals and any requirements or standards established by law. In general, by purchasing our services and/or submitting information to us in connection with your use of our Website, you are providing your consent to the collection, use and disclosure of personal information as set out in this Policy and in our Terms of Use.

Right to Withdraw Consent and Unsubscribing

You can withdraw your consent to our use of your personal information at any time. If you do so, we may not be able to provide with all of our services. We may nonetheless keep your information if we have a legal basis to do so.

Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice; however, without such consent, we may limit the services that we are able to provide customers.

If at any point you do not wish to receive promotional offers or information related to Tidan, you may unsubscribe or opt-out by sending an e-mail to info@tidan.com using the subject line "Unsubscribe", so indicating your request with sufficient personal identifiers so we can

appropriately act on your request. All our marketing and promotional communications will contain instructions for unsubscribing.

Sharing of Personal Information by Tidan

We may share your personal information with our employees and service providers who are assisting us with our operations. We may also share your information when required to do so under applicable law or to a person who we believe is authorized to represent you. Finally we may provide your information to third parties should we undergo a business transaction, reorganize or finance our business.

Personal information disclosed to Tidan is intended only for usage by personnel of Tidan and will not be disclosed to, or accessed by, other parties, except as provided in this Policy or as otherwise required or permitted by applicable law:

Employees. Tidan may disclose the information it collects from you to its employees, agents and service providers only if the disclosure is necessary to allow these parties to perform their business, professional, or technical support function for or on behalf of Tidan. Employees that receive personal information will be subject to the same obligations as Tidan under this Policy.

Third party or affiliated service providers. We may hire service providers, which may be affiliates, to perform services on our behalf. This may include, without limitation, a person or an organization retained by Tidan to perform work on its behalf, including for the collection of customer accounts, customer credit verification, accounting services or others. We may also share your information with service providers that may collect data and produce reports on our behalf regarding our customers' activities on the Website and assist us with marketing and advertising efforts. We provide our service providers and third party affiliates with a limited amount of information which is necessary in order for them to provide the services required. They are prohibited from using the information for purposes other than to facilitate and carry out the services they have been engaged to provide. These service providers are not permitted to disclose this information to others. We will strive to protect personal information disclosed to third parties by contractual agreements requiring that those third parties adhere to confidentiality and security procedures and protections that are, at a minimum, equivalent to those employed by Tidan itself.

As permitted or required by law. From time to time, Tidan may be compelled to disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where Tidan has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to protect Tidan's rights and property.

Business transaction. If Tidan is involved in a merger or other reorganization, Tidan may also disclose your personal information to the resulting organization.

Tidan does not sell your personal information. Only employees of Tidan or trusted third party contractors, who need access for business reasons, or whose duties reasonably so require, will be granted access to personal information about customers.

Children

Children should not use or access our Website or should do so with a parent or guardian.

Tidan recognizes the importance of safeguarding the privacy of children and encourage parents to check and monitor their children's use of online activities regularly. Our Website is not aimed at nor intended for children under the age of thirteen (13). If you are under the age of thirteen (13), please do not use our Website, and if you are over the age of thirteen (13) but under the age of majority in the province or foreign jurisdiction in which you reside, you should use our Website only with the involvement and permission of a parent or legal guardian. No personal information is purposefully or knowingly collected from children under the age of thirteen (13) by us without parental consent.

Security

We protect your personal information against security incidents.

We are committed to protect the quality and integrity of your personal information. Tidan has implemented technologies and security safeguards appropriate to the sensitivity of the information to protect the stored personal information of our customers and Website users from unauthorised access, improper use, alteration, unlawful or accidental destruction and accidental loss. We will continue to enhance our security procedures as new technology becomes available.

Storage of Personal Information

We store and process your personal information in Canada and the United States. We strive to protect your personal information in accordance with this Policy, wherever it is stored or processed.

Your personal information is stored at Tidan's offices located at 666 Sherbrooke St. West, Suite 2300 Montreal, Quebec H3A 1E7 or at other locations in Canada or in the United States. In some instances, personal information may be stored, processed or accessed outside of Canada including in the United States, and may be subject to the laws of that foreign jurisdiction, and may be accessible to that jurisdiction's governments, courts or law enforcement or regulatory agencies. We will strive to protect personal information disclosed to third parties by contractual agreements requiring that those third parties adhere to confidentiality and security procedures and protections that are, at a minimum, equivalent to those employed by Tidan itself.

Personal information will be retained only as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise required by law. Personal information that is no longer required to fulfil the identified purposes will be destroyed or erased.

Website Privacy

We collect technical information through our Website and social media channels using cookies and other technologies. You can block these cookies, however, in such a case we may not be able to provide you with all our Website's functionalities.

Like many other websites, this Website may automatically collect certain non-identifiable information from its Website users to help us provide better customer service. For example, we keep track of the sites from which people visit and we also measure visitor activity on the Website, but we do so in ways that keep the collected information anonymous. We use such information to measure the number of visitors to the different areas of the Website, and to help us make the Website more useful to visitors. This includes analyzing these logs of anonymous information periodically to measure the traffic through our servers, the number of pages visited and the level of demand for pages and topics of interest. The logs may be preserved indefinitely and used and/or disclosed at any time and in any way to prevent security breaches and to ensure the integrity of the data on our servers.

- Information you provide: In many cases, we collect personal information directly from you
 when you visit or use our website. For instance, we may collect the following types of
 information:
 - Inquiries. We may collect your name, contact information, e-mail address and any information you provide us when you make an inquiry or contact us through our Website. We will only use this information to provide you with the information requested or to contact you in order to answer your questions and/or requests.
 - Satisfaction Survey. When you visit our website, you may, from time to time, be invited to participate to a satisfaction survey. In such case and if you decide to participate to our survey, we may collect your postal code, email address and other information deemed important to complete such survey. We will only use your information for quality assurance purposes.
- Technical information: When you visit our website, we may collect, using electronic means such as cookies, technical information. This information may include information about your visit to our website, including the IP address of your computer and which browser you used to view our website, your operating system, resolution of screen, location, language settings in browsers, the site you came from, keywords searched (if arriving from a search engine), the number of page views, information you entered, advertisements you have seen, etc. This data is used to measure and improve the effectiveness of our Website or enhance the experience for our customers. We treat this information as personal information when it is associated with your account or contact information. For instance, we may collect the following types of information:
 - Google Analytics: We use Google Analytics which allows us to see information on user website activities including, but not limited to, page views, source and time spent on our Website. This information is depersonalized and is displayed as numbers, meaning that it cannot be tracked back to individuals. You may opt-out of our use of Google Analytics by visiting the Google Analytics opt-out page.
 - AdWords: Our service providers may use Google AdWords Remarketing or other similar tools to advertise across the Internet and to advertise on third party websites

(including Google) to previous visitors to our Website. These tools will display ads to you based on what parts of the Website you have viewed by placing a cookie on your web browser. It could mean that our service providers advertise to previous visitors who, for example, haven't completed a reservation on our site, or this could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is only used to indicate to other websites that you have visited a particular page on our Website, so that they may show you ads relating to that page. If you do not wish to participate in Google AdWords Remarketing, you can opt out by visiting Google's Ads Preferences Manager.

- Interest-based Advertising. We may also allow a limited number of trusted third parties to install cookies on your hard drive from our Website. Our Website may include third-party advertising and links to other websites which may be used to generate personalized advertisements. Personalized ads, sometimes referred to as interest-based or behavioral ads, are ads based upon information about you, such as your page views on our Website, your information requests or reservations on our Website. We do not provide any personal information to advertisers. However, advertisers and other third-parties (including the ad networks, ad-serving companies, and other service providers they may use) may assume that users who interact with or click on a personalized ad or content displayed on our websites are part of the group that the ad or content is directed towards. Advertisers or ad companies working on their behalf sometimes use technology to serve the ads that appear on our websites directly to your browser. They may also use cookies to measure the effectiveness of their ads and to personalize ad content. We do not have access to or control over cookies or other features that advertisers and third party sites may use, and the information practices of these advertisers and third party websites are not covered by our Policy. Please contact them directly for more information about their privacy practices. You can also generally opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Digital Advertising Alliance of Canada. Please visit the DAAC opt-out page for more information.
- Social media. We may also collect personal information about you from your interactions with us on Facebook, Twitter, YouTube or Instagram) as well as from your use of social media networks you participate in ("Social Media Channels"), but only when you have provided your consent and at all times in compliance with applicable privacy laws. You may also choose to participate in a third party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third party website) through which you allow us to collect (or the third party to share) information about you, (including personal data) such as details of your friends/connections, "likes", comments you have shared, groups and location. In addition, we may receive information about you (including your personal data) if other users of a third party website give us access to their profiles and you are one of their friends/connections or information about you is otherwise accessible through your friends'/connections' web page, profile page, or similar page on a Social Media Channel or other third party website or interactive service. We may supplement the information we collect about you directly with the information we receive from third parties in order to enhance our ability to serve you, to tailor our content to you and

send you details of promotions and/or offers which we believe may be of interest to you, although at all times, in compliance with applicable privacy laws.

Also, when collecting personal data from you in connection with a transaction we may extract some information about that transaction in an anonymous format and combine it with other anonymous information. This anonymous information is used and analyzed only at an aggregate level to help us understand trends and patterns. None of this information is reviewed at an individual level. We do not associate the information stored in a visitor's cookie with any other personal information about that visitor. If you do not want your transaction details used in this manner, you may disable cookies on your Internet web browser. Our Website includes a cookie banner to help you easily accept the cookies from us and our trusted third parties. The "Help" feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Note that if you choose to withhold consent, or subsequently block cookies, you may not be able to access all or part of the content of our website.

Access to Personal Information

You have the right to access the personal information we have about you.

Subject to certain exceptions prescribed by law, you may, by written request, ask us whether we are keeping personal information about you and you can request to receive a copy of that personal information or request to correct such information. However, before sending you any personal information, we will ask you to provide proof of your identity. If you are not able to provide proof of your identity, we reserve the right to refuse to disclose the personal information requested. We will make a sincere effort to respond to your requests for access in a timely manner or to correct inaccuracies in your personal information to the extent you have proven such inaccuracies.

Links to Other Sites

This Policy does not apply to other websites that are accessible through our Website.

This Policy only addresses the use and disclosure of information by Tidan. Other organizations whose websites may be accessible through or from our Website may adhere to different privacy standards. When visiting the websites of other organizations, you are encouraged to first review their respective privacy policies. Please note that Tidan is not responsible or liable for the privacy policies or content of third-party sites. Your use of such other sites and your dealings with the owners or operators of such other sites is at your own risk.

Website Terms of Use

Our Terms of Use also apply to your use of our Website.

The Website Terms of Use governing your use of the Website (which may be viewed by clicking here) contain important provisions disclaiming and excluding the liability of Tidan and others regarding your use of the Website and provisions determining the applicable law and exclusive

jurisdiction for the resolution of any disputes regarding your use of the Website. Each of those provisions also applies to any disputes that may arise in relation to this Policy and the collection, use and disclosure of your personal information, and are of the same force and effect as if they had been reproduced directly in this Policy.

Additional Terms for Users Located in the Economic European Area and Switzerland

If you are located in the EEA or Switzerland, these additional terms apply to you.

Lawful basses for processing

We will only process your personal information if we have a lawful base to do so, which includes where you have given consent, where processing is necessary for the performance of a contract with you (e.g. to provide the services you have requested), or where we other legitimate interests such as protecting you or us from security threats, for internal business requirements or to improve our business or customer relationships generally.

Additional rights regarding your personal information

In addition to the rights mentioned in the <u>Access and Correction</u> section, you may, subject to applicable law:

- have the right to restrict or limit the ways in which we process your personal information for instance where you believe your data is inaccurate;
- have the right to object to the processing of your personal information by us in certain circumstances, such as the those described above however we may continue to do so unless your interests, rights and freedoms override such interests;
- request that we delete your personal information, in which case we will carry out this
 request unless certain exceptional reasons arise permitting us to keep certain information
 about you; and
- obtain a copy of your personal information in a machine-readable format. In certain circumstances, you can also request that we transfer some of your information to third parties.

If you have any questions about these additional rights, please contact us using the contact information detailed in the Contacting Us section.

Changes to Privacy Protection Policy

Tidan reviews and updates its policies and procedures as required to keep current with rules and regulations, new technologies, standards and customer concerns. We may therefore change, modify or supplement this Policy from time to time. We will post any changes on our Website and, if the changes are significant, we will provide a more prominent notice.

This Policy was last revised on October • 2018.

Please note that both the English and French versions of our Privacy Policy have equal legal value.

Contacting Us

If you have any comments, questions or complaints about this Policy or your personal information, please contact us at:

Tidan Hospitality & Real Estate Group

Corporate Office 666 Sherbrooke St. West, Suite 2300 Montreal, Quebec H3A 1E7

Tel: 514-845-6393 Fax: 514-845-8640 E-mail: info@tidan.com

MTL01: 4640726: v5